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8
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10 BENT CORYDON

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11
12 SUPERIOR COURT OF THE STATE OF CALIFORNIA
13 FOR THE COUNTY OF LOS ANGELES

14 BENT CORYDON,

15 Plaintiff,

16 vs.

17 CHURCH OF SCIENTOLOGY
18 INTERNATIONAL, INC.; AUTHOR
19 SERVICES, INC.; AUTHOR FAMILY
20 TRUST; ESTATE OF L. RON
21 HUBBARD; HEBER JENTZSCH;
22 SHIRLEY YOUNG; DAVID
23 MISCAVIGE; TIMOTHY BOWLES;
24 BRAD BALLENTINE;
25 WARREN MCSHANE and DOES 1
26 through 100, inclusive,
27 Defendants.

CASE NO. C 694401

SECOND AMENDED COMPLAINT
FOR LIBEL; SLANDER;
LIBEL PER SE; SLANDER PER SE;
INTERFERENCE WITH ECONOMIC
ADVANTAGE; INTERFERENCE WITH
CONTRACTUAL RELATIONS;
INTENTIONAL INFLECTION OF
EMOTIONAL DISTRESS;
NEGLIGENT INFLECTION OF
EMOTIONAL DISTRESS

28 Plaintiff BENT CORYDON alleges as follows:

1. Plaintiff BENT CORYDON is an individual domiciled in the State of California, County of Riverside.

2. Plaintiff is informed and believes and thereon alleges that Defendants CHURCH OF SCIENTOLOGY INTERNATIONAL, INC. and

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2 AUTHOR SERVICES, INC. are, and at all times herein mentioned
3 were, California corporations duly authorized to do, and doing,
4 business in the State of California, County of Los Angeles.

5
6 3. Plaintiff is informed and believes, and thereon
7 alleges, that Defendants AUTHOR FAMILY TRUST and ESTATE OF L. RON
8 HUBBARD, and each of them, are entities duly formed and operating
9 under the laws of the State of California conducting business and
10 other activities in the County of Los Angeles.

11
12 4. Plaintiff is informed and believes, and thereon
13 alleged, that Defendants HEBER JENTZSCH and SHIRLEY YOUNG, and
14 each of them, are individuals operating in the County of Los
15 Angeles as agents, partners, members or employees of Defendant
16 CHURCH OF SCIENTOLOGY INTERNATIONAL, INC. (hereinafter referred
17 to as Defendant "Church").

18
19 5. Plaintiff is informed and believes, and thereon
20 alleges, that Defendants DAVID MISCAVIGE and TIMOTHY BOWLES are
21 individuals operating in the County of Los Angeles as agents,
22 partners, members or employees of Defendant CHURCH.

23
24 6. Plaintiff is informed and believes, and thereon
25 alleges, that the Defendants CHURCH and AUTHOR SERVICES, INC.,
26 and each of them, are subject to and operating under, a unity of
27 control agreement and arrangement, said separate alleged
28 corporate structures having been created for illicit and illegal
purposes, including but not limited to, avoidance of payment of

1 taxes and civil judgments. Said Defendants, and each of them,
2 operate a unity of personnel, co-mingle assets and work jointly
3 toward common business objectives.
4

5
6 7. Plaintiff is informed and believes, and thereon
7 alleges, that the designation of said Defendant organizations as
8 "churches" or other religious entities is fallacious and a sham
9 calculated and contrived to exploit protections of the First
10 Amendment of the United States Constitution, and at no time
11 herein mentioned did said Defendants render any religious
12 services, or engage in any religious activities whatsoever.
13 Rather, said organizations were created solely for the purpose of
14 making money from the sale of copyrights of the book Dianetics,
15 written by L. Ron Hubbard, and from the exploitation of thousands
16 of individuals, including Plaintiff, pursuant to delineated and
17 self-determined doctrines and policies.

18
19 8. The true names, identities or capacities, whether
20 individual, associate, corporate or otherwise, of Defendants DOES
21 1 through 100, are unknown to Plaintiff, who therefore sues said
22 Defendants by such fictitious names. When the true names,
23 identities or capacities of such fictitiously designated
24 Defendants are ascertained, Plaintiff will seek leave of Court to
25 amend this Complaint to insert the true names, identities and
26 capacities, together with the proper supporting charging
27 allegations.
28

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2 9. Plaintiff is informed and believes and thereon alleges
3 that each of the Defendants designated as a DOE is negligently,
4 consciously, willfully, intentionally, knowingly, recklessly,
5 despicably or otherwise tortiously or legally responsible in some
6 manner for the events and happenings herein referred to, and
7 negligently, consciously, willfully, intentionally, knowingly,
8 recklessly or despicably or otherwise tortiously caused the
9 injuries proximately thereby to Plaintiff as hereinafter alleged,
10 either through said Defendants' own activity, or through their
11 agents, servants, associates or employees, and each of them, or
12 due to said Defendants' own defamatory, slanderous or libelous
13 statements or conduct.

14
15 10. At all times herein mentioned each of the Defendants
16 was the agent, servant, employee, fellow member, associate and/or
17 joint venturer of each of the other remaining Defendants and was
18 at all times acting within the purpose and scope of said agency,
19 employment or joint venture and acting with the express and
20 implied knowledge, commission or consent of the remaining
21 Defendants, and each of them. The acts of each Defendant were
22 qualified and/or ratified by each other Defendant and, together,
23 constitute a single course of conduct.

24
25 11. From the period in or about 1962 until 1986 Plaintiff
26 was a recognized and qualified member of Defendant CHURCH.
27 Plaintiff was duly indoctrinated into the Defendant CHURCH by
28 regular and active recruitment techniques which involved claims
that the programs and benefits offered by Defendant CHURCH would

1
2 raise intelligent quotient to that of genius, prevent illnesses
3 in participants and other attractive occurrences. Plaintiff paid
4 substantial consideration to Defendant CHURCH for these programs.
5

6 12. In or about 1970, Plaintiff, having qualified for and
7 achieved the highest status of counselor and minister in
8 Scientology, within Defendant CHURCH, started his own franchise
9 "mission" in Riverside, California. Said mission was purchased
10 and subsidized wholly and exclusively with Plaintiff's monies and
11 assets, and operated as an autonomous entity entirely independent
12 of Defendant CHURCH under the general doctrine of Scientology.
13

14 13. In or about 1973, said franchise experienced rapid
15 growth and widespread success. By 1977 said franchise had 180
16 full-time staff members. At all times, Plaintiff's personal
17 assets, money and investments were used to support said
18 franchise enabling it to prosper and grow.
19

20 14. In or about 1978, Plaintiff was called to Florida by
21 Defendants, and each of them, for debriefing on the success of
22 his Riverside franchise. Plaintiff was instructed by Defendants,
23 and each of them, that he must sign over his franchise to
24 Defendants, and each of them, under the threat of subjection to
25 "Fair Game", a Defendant CHURCH doctrine and policy directing
26 that any individual or employee who expresses a lack of loyalty
27 or a refusal to comply with Defendants', and each of their,
28 orders is open to any form of harassment, economic ruin or
subject to any form of harassment, economic ruin or

1
2 cause emotional or physical harm and/or financial ruin no matter
3 how invasive or despicable the method employed. This CHURCH
4 doctrine champions the destruction of an individual's business or
5 reputation, by a variety of tactics including framing false
6 charges of criminal acts. Subsequent to this threat as
7 communicated by Defendants, and each of them, and in response
8 thereto, Plaintiff was coerced by Defendants, and each of them,
9 to sign over and transfer his Riverside franchise to Defendants
10 so as to avoid the plight of "Fair Game."

11
12 15. In or about 1981, L. Ron Hubbard, President of
13 Defendant CHURCH, had gone into hiding and seclusion following an
14 F.B.I. raid on several Defendant CHURCH offices nationwide.
15 During said period of time, Plaintiff successfully recovered his
16 Riverside franchise and board member position from Defendants,
17 and each of them.

18
19 16. In or about 1980, Plaintiff was arrested and pleaded
20 guilty to assault charges, which charges arose when Plaintiff
21 became targeted to become State's evidence and testify against
22 Defendant Church. Defendants, and each of them, provided
23 Plaintiff with defense in this action, and said charges were
24 subsequently dropped.

25
26 17. In order to obtain or maintain a franchise within
27 Defendant CHURCH it is required that the franchisee be free of
28 any criminal record. Defendant, HEBER JENTZSCH, President of The
Church of Scientology International was present when Plaintiff

1
2 personally handed over documents and communicated to Defendant
3 CHURCH representatives that his record had been wholly expunged
4 for the 1980 charges of assault and his name wholly cleared.

5
6 18. On or about August 3, 1987, Defendants, and each of
7 them, specifically including Defendant HEBER JENTZSCH, caused to
8 be printed, published and circulated an article in the St.
9 Petersberg Times, a news publication of wide circulation which
10 articles contained the following untrue statements:

11
12 "Corydon has a criminal record! He has
13 obviously lied before, and I say when a
14 man has a criminal record, he has a
15 credibility problem."

16
17 19. Defendants, and each of them, caused such statements to
18 be published knowing them to be false and further knowing that
19 the untrue statement would reach readers of the paper and be
20 subject to widespread dissemination all to Plaintiff's injury and
21 damage.

22
23 20. In or about 1986, after breaking from Defendant CHURCH,
24 Plaintiff wrote a book entitled, L. Ron Hubbard; Messiah or
25 Madman? which contained a detailed expose of the indiscretions
26 and practices of Defendant Church. Defendants, and each of them,
27 knowingly and intentionally attempted to bribe two print factory
28 workers in order to get an early copy of the manuscript for their
own illicit purposes.

EXHIBIT C

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2 21. Defendants, and each of them, filed a series of Court
3 orders in an attempt to force Plaintiff and his publisher, Lyle
4 Stewart, to turn over notes, tapes and sources upon which said
5 book was based. The legal costs incurred by Plaintiff in
6 opposing these meritless motions wholly eradicated Plaintiff's
7 royalties from his book.

8
9 22. Following publication of said book, Plaintiff was
10 invited to speak and spoke on various electronic media, including
11 CBS Morning Show, Nightwatch, and WWOR-TV. At several of these
12 shows, Defendants HEBER JENTZSCH, SHIRLEY YOUNG, TIMOTHY BOWLES,
13 and other Defendant CHURCH affiliates appeared or called in and
14 again, on behalf of all Defendants herein, falsely stated that
15 Plaintiff had a criminal record. Further, Defendants inundated
16 the media with similar false allegations critical of Plaintiff,
17 each aforestated communication having occurred while Defendants,
18 and each of them, knew the information to be false.

19
20 23. Defendants DAVID MISCAVIGE, Defendant CHURCH's top
21 executive and Hubbard's successor and DOES 1 through 25,
22 inclusive, and each of them, purposefully directed and instructed
23 agents of Defendant CHURCH to assault, batter, intimidate and
24 otherwise "rough up" Plaintiff. When the agents arrived to
25 effectuate this plan, Plaintiff was out and a co-worker and
26 associate of Plaintiff's was "roughed up" instead. While
27 assaulting and battering Plaintiff's associate, the agents of
28 Defendants, and each of them, stated: "Since Corydon's not here,
you'll do. You are standing in the way of Ron's Bridge!"

1
2 FIRST CAUSE OF ACTION

3 (Libel, as Against Each and Every Defendant)

4
5 24. Plaintiff realleges by this reference and incorporates
6 paragraphs 1 through 23 inclusive, and by this reference makes
7 them a part hereof.

8
9 25. On or after August 3, 1987, Defendants CHURCH, HEBER
10 JENTZSCH, SHIRLEY YOUNG and Does 1 through 50, inclusive, and
11 each of them, caused to be printed and circulated, certain
12 written matter wherein it was stated, charged and inferred that
13 Plaintiff had a criminal record and was involved in criminal
14 activity which assertions were wholly false. As such, the
15 writings libeled and defamed Plaintiff.

16
17 26. The acts of the Defendants, and each of them, were
18 conducted for the calculated and intended purpose of causing the
19 readers of said defamatory material to shun Plaintiff, to refrain
20 from buying Plaintiff's book, to damage and injure Plaintiff's
21 reputation, and to cause Plaintiff to suffer great and grievous
22 humiliation, embarrassment, anxiety, mental anguish and emotional
23 distress.

24
25 27. All such writings, statements, inferences and charges
26 therein contained, were false, were known to said Defendants, and
27 each of them, to be false when made, were made without
28 justification and privilege, and were made with the intent and
purpose of injuring and damaging Plaintiff's reputation, and to

EXHIBIT C

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2 embarrass and humiliate Plaintiff, and to cause Plaintiff to
3 suffer great and grievous humiliatory embarrassment, mental
4 anguish and emotional distress.

5
6 28. As a direct and proximate result of said Defendants'
7 aforesaid defamatory publications, writings and conduct,
8 Plaintiff was injured and damaged in his business and reputation,
9 and was caused to suffer severe embarrassment, humiliation,
10 mental anguish and emotional distress, all to Plaintiff's general
11 damage in a sum to be determined according to proof at time of
12 trial.

13
14 SECOND CAUSE OF ACTION

15 (Slander, as Against Each and Every Defendant)

16
17 29. Plaintiff realleges by this reference and incorporates
18 paragraphs 1 through 28, inclusive, and by this reference makes
19 them a part hereof.

20
21 30. On or after August 3, 1987, on several different
22 broadcasts, Defendants, CHURCH, HEBER JENTZSCH, SHIRLEY YOUNG and
23 DOES 1 through 25, inclusive, and each of them, stated and
24 broadcasted to the general public at large that Plaintiff had a
25 criminal record.

26
27 31. All of Defendants' aforestated statements, charges and
28 accusations were false, and were known by Defendants, and each of
them, to be false when made, and were made without justification

EXHIBIT C

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2 or privilege and were made with the calculated intent and purpose
3 of injuring and damaging Plaintiff's reputation, and to embarrass
4 Plaintiff and to cause Plaintiff to suffer humiliation, mental
5 anguish and emotional distress. As such, Defendants' statements
6 slandered and defamed Plaintiff.

7
8 32. As a direct and proximate result of Defendants'
9 conduct, statements and accusations, Plaintiff was injured in his
10 business and reputation, and was caused to suffer severe
11 embarrassment, humiliation, mental anguish and emotional
12 distress, all to his general damage in an amount according to
13 proof at time of trial.

14
15 33. As a further direct and proximate result of Defendants'
16 conduct, statements and accusations, Plaintiff suffered loss of
17 business opportunities, and loss of income and earnings. The
18 full nature and extent of said damages, loss of business
19 opportunities, and loss of income and earnings is not now known
20 to Plaintiff who will seek leave to amend this Complaint to
21 include such items of special damages, as herein set forth when
22 the same has been ascertained.

23
24 THIRD CAUSE OF ACTION

25 (Libel Per Se, As Against Each and Every Defendant)

26
27 34. Plaintiff realleges by this reference and incorporates
28 paragraphs 1 through 28, inclusive, and by this reference makes
them a part hereof.

EXHIBIT C

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2 35. On or after August 3, 1987, Defendants, and each of
3 them, caused to be printed and circulated, certain written matter
4 wherein it was falsely stated, charged and inferred that
5 Plaintiff had a criminal record. This material was clearly
6 libelous on its face since Defendants, and each of them, were
7 aware that the material was false and made without justification
8 or privilege. Due to their content, said defamatory writings
9 constituted libel per se and proximately caused the damages to
10 Plaintiff as heretofore alleged.

11
12 FOURTH CAUSE OF ACTION

13 (Slander Per Se, As Against Each and Every Defendant)

14
15 36. Plaintiff realleges by this reference and incorporates
16 paragraphs 1 through 23, inclusive, and paragraphs 29 through 33,
17 inclusive, and by this reference makes them a part hereof.

18
19 37. On or after August 3, 1987, on several different
20 broadcasts, Defendants, and each of them, stated and broadcast to
21 the general public that Plaintiff had a criminal record and had
22 been involved in criminal activities. These statements were
23 slanderous on their face since Defendants knew that the
24 statements were false and dealt with allegations of criminal
25 conduct.

26
27 38. Defendants', and each of their, above-described
28 conduct, was done for the sole purpose of injuring and damaging
Plaintiff's business and reputation, interfering with Plaintiff's

1
2 economic advantages and proximately causing Plaintiff to suffer
3 great emotional distress as heretofore set forth.

4
5 FIFTH CAUSE OF ACTION

6 (Interference with Prospective Economic Advantage
7 As Against Each and Every Defendant)

8 39. Plaintiff realleges by this reference and incorporates
9 herein paragraphs 1 through 38, inclusive, and by this reference
10 makes them a part hereof.

11
12 40. In or about January, 1986, Plaintiff entered into an
13 economic and business relationship with Lyle Stewart, Publisher
14 of Plaintiff's book together with the with the general public,
15 who were those who would purchase Plaintiff's book. At all
16 times, Defendants, and each of them, were aware of the existence
17 of the relationship between Plaintiff and his publisher and
18 between Plaintiff and the public.

19
20 41. At all said times herein mentioned Defendants, and each
21 of them, intended to and did use defamatory and false material to
22 demean and disgrace Plaintiff and to intentionally interfere with
23 Plaintiff's business concerns, as heretofore alleged.

24
25 42. At all said times herein mentioned Defendants, and each
26 of them, used threats, harassment, intimidation, bribes and other
27 despicable conduct to intentionally interfere with Plaintiff's
28 business by discouraging and preventing the distribution and sale
of Plaintiff's book.

1
2 43. The Defendants' statements, activities and conduct as
3 heretofore alleged, was done with the intent and purpose of
4 interfering with Plaintiff's business activities and to cause
5 Plaintiff to lose readers, business opportunities, income and
6 earnings. As a direct and proximate result of such statements,
7 activities and conduct, Plaintiff did lose readers, and buyers of
8 his book, business opportunities, and income and earnings which
9 would have occurred but for the actions of Defendants, and each
10 of them, all to Plaintiff's general damage. The exact amount and
11 extent of such damages have not been fully ascertained at this
12 time. Plaintiff will seek leave of Court to amend this Complaint
13 when such damages have been fully ascertained.
14

15
16 SIXTH CAUSE OF ACTION

17 (Interference with Contractual Relations
18 As Against Each and Every Defendant)

19 44. Plaintiff realleges by this reference and incorporates
20 herein paragraphs 1 through 43 inclusive, and by this reference
21 makes them a part hereof.
22

23 45. In or about January, 1986, Plaintiff entered into a
24 valid and existing contract with Lyle Stewart, publisher of
25 Plaintiff's book. At all times herein mentioned, Defendants, and
26 each of them, were aware and had knowledge of the existence of
27 this contract.
28

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EXHIBIT C

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2 46. At all times herein mentioned, Defendants, and each of
3 them, intended to use the defamatory and false material as
4 heretofore alleged to demean and discredit Plaintiff and to
5 intentionally make the performance of said contract difficult
6 and/or impossible.

7
8 47. Defendants, and each of them, used threats, harassment
9 and intimidation and bribes to intentionally interfere with
10 Plaintiff's performance of said contract.

11
12 48. Defendants', and each of their, statements, activities
13 and conduct as hereinabove alleged, were done with the intent and
14 purpose of interfering with Plaintiff's performance of said
15 contract and to cause Plaintiff to lose readers, business
16 opportunities, income and earnings. As a direct result of such
17 statements, activities and conduct, Plaintiff did lose readers,
18 potential buyers of his book, business opportunities, income and
19 earnings which would have accrued but for the actions of
20 Defendants are to Plaintiff's general damage as heretofore
21 alleged. The exact amount and extent of such damages have not
22 been fully ascertained at this time. Plaintiff will seek leave
23 of Court to amend this Complaint, when such damages are fully
24 ascertained.

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EXHIBIT C

1
2 SEVENTH CAUSE OF ACTION

3 (Intentional Infliction of Emotional Distress
4 As Against Each and Every Defendant)

5 49. Plaintiff realleges by this reference and incorporates
6 herein each of the allegations contained in paragraphs 1 through
7 48, inclusive.

8
9 50. Defendants, and each of them, employed intimidation
10 techniques and coercive methods of a psychological nature
11 including but not limited to, subjection of Plaintiff to the
12 policy of "Fair Game", threats and harassment while fully aware
13 of the particular susceptibility of Plaintiff to these tactics.
14 Said conduct and practices were intended to, and did, cause
15 Plaintiff severe emotional distress and upset all to Plaintiff's
16 general damage.

17
18 51. All of the Defendants' aforestated statements, writings
19 and conduct, as heretofore alleged, were made, performed and
20 published when Defendants, and each of them, knew that the false,
21 outrageous and demeaning character of their statements, writings
22 and conduct were likely to cause Plaintiff to suffer great and
23 grievous mental anguish and emotional distress, and were further
24 made, performed and published with a willful, wanton and
25 despicable disregard for Plaintiff's peace, health and
26 well-being, and for the further intent and purpose of causing
27 Plaintiff to suffer great and grievous mental anguish, emotional
28 distress, humiliation, anxiety, embarrassment and disgrace.

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EXHIBIT C

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2 52. As the proximate result of the Defendants' acts, as
3 heretofore set forth, Plaintiff did suffer the afore-mentioned
4 consequences and has been and is injured in mind and body all to
5 his general damage in an amount according to proof at trial.

6
7 53. The afore-mentioned acts of Defendants were willful,
8 wanton, despicable, malicious and oppressive and justify the
9 awarding of exemplary and punitive damages against Defendants,
10 and each of them, according to proof at time of trial.

11
12 EIGHTH CAUSE OF ACTION

13 (Negligent Infliction of Emotional Distress
14 As Against Each and Every Defendant)

15 54. Plaintiff realleges by this reference and incorporates
16 herein paragraphs 1 through 48, inclusive, and by this reference
17 makes them a part hereof.

18
19 55. That all of the Defendants' false and outrageous
20 statements, writings and conduct, as heretofore alleged, were
21 made, performed and published when Defendants knew or should have
22 known of the false, outrageous and demeaning character of said
23 statements, writings and conduct. Defendants knew, or in the
24 exercise of reasonable care, should have known and foreseen that
25 their statements, writings and conduct were likely to cause
26 Plaintiff to suffer great and grievous mental anguish and
27 emotional distress. Defendants made, performed and published the
28 aforestated statements and writings with wanton, reckless and
willful disregard for Plaintiff's peace, health and well-being

1 causing Plaintiff to suffer great and grievous mental anguish,
2 emotional distress, humiliation, anxiety, embarrassment and
3 disgrace.
4

5
6 56. As a direct and proximate result of Defendants'
7 willful, wanton and recklessly outrageous actions, as heretofore
8 set forth, Plaintiff has suffered, and continues to suffer, great
9 and grievous mental anguish, emotional distress, humiliation,
10 anxiety, embarrassment, and disgrace all to Plaintiff's general
11 damage in an amount the Court may deem just and proper according
12 to proof at trial.
13

14 NINTH CAUSE OF ACTION

15 (Interference with Prospective Economic Advantage
16 Against Each and Every Defendant)

17 57. Plaintiff realleges by this reference and incorporates
18 herein paragraphs 1 through 23, inclusive, and by this reference
19 makes them a part hereof.
20

21 58. Following the filing of a lawsuit captioned Church of
22 Scientology Mission of Riverside, et al. v. Bent Corydon, et al.,
23 Riverside Superior Court Case No. 154129 (hereinafter "COSMOR
24 Lawsuit"), by Defendants herein, Plaintiff and others filed a
25 First Amended Cross-Complaint in that action. The
26 Cross-Complainants in the COSMOR lawsuit shall be identified
27 herein as the "Cosmor Defendants. Defendants, and each of them,
28 thereafter entered in a conspiracy against the COSMOR Defendants,
including Plaintiff herein, pursuant to their "Fair Game"

1 policies. Under the Fair Game Policy people who are adverse to
2 the Church of Scientology are fair game for harassment,
3 intimidation, theft, and financial and personal ruin.
4

5
6 59. This conspiracy was carried out by secret plans which
7 were placed into action to harass Cosmor Defendants, instill
8 fear, interfere with their abilities to earn a living, and to
9 destroy the defense and prosecution in that case. This
10 conspiratorial plan included placing a spy in the offices at the
11 Cosmor Defendants for purposes of learning their litigation
12 strategy and for sabotaging the same.
13

14 60. Pursuant to this plan, Defendants herein recruited
15 Scientologist TOM ARMISTEAD to encourage conversation with
16 Plaintiff BENT CORYDON in hopes that he would divulge vital
17 information.
18

19 61. In furtherance of the conspiracy, agent ARMISTEAD
20 advised Defendants of certain documents in Plaintiff's
21 possession. On Defendants' instructions, in September and
22 October 1983, agent ARMISTEAD went back to the CHURCH OF
23 SCIOLOGOS and copied said documents and forwarded them to
24 Defendants.
25

26 62. Towards the end of 1983, agent ARMISTEAD was given
27 instructions designed to sabotage the Church. This was pursuant
28 to L. RON HUBBARD's, "Ron's Journal 38" which was designed to
dissuade people from joining independent centers.

1
2 63. On March 5, 1984, Defendants, and each of them,
3 commenced a project aimed at financially wiping out the Cosmor
4 Defendants by swamping them with small claims court actions by
5 former Scientologists seeking return of donations. This project
6 was designed to "cave-in" Plaintiff MARC CHACON by overworking
7 him and forcing him to leave SCIOLOGOS.

8
9 64. Pursuant to the above plan, in addition to filing on
10 different dates numerous small claims actions, agent ARMISTEAD
11 was to befriend COSMOR Defendant MARC CHACON and make comments to
12 him, as friendly suggestions, that he is tired, overworked, and
13 that perhaps it is all not worth it and he should leave
14 SCIOLOGOS. Defendants, and each of them, believed that SCIOLOGOS
15 could not operate without MARC CHACON. It was also believed by
16 Defendants that MARC CHACON was necessary to the defense and
17 prosecution of the earlier litigation.

18
19 65. Simultaneously, SCIENTOLOGY, through agent ARMISTEAD,
20 continued to make every effort through the phony friendship with
21 Plaintiffs, to learn all strategies involved in the COSMOR
22 action.

23
24 66. Further, agent ARMISTEAD was to befriend SCIOLOGOS
25 employee JEANNIE HANSEN and encourage her to get involved in a
26 Starway program which then would be arranged to have meetings
27 during the times that Plaintiff's CHURCH needed her the most.

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2 67. Defendants, and each of them, pursuant to said
3 conspiracy, have also taken actions designed to get SCIOLOGOS
4 parking lot away from the Church. In addition, agent ARMISTEAD
5 was further instructed, and he did, to obtain floor plans of the
6 Church where each individual's office was, and who stayed at the
7 Church at night.

8
9 68. In 1984, upon discovering that Plaintiff BENT CORYDON
10 and his wife were going to New Zealand, plans were then made to
11 harass the CORYDONS in Europe. In fact, they were verbally
12 abused by Scientologists in said country while giving a lecture.

13
14 69. In 1985 Agents of the Church of Scientology dragged
15 BENT CORYDON out of a telephone booth in Gilmore Hot Springs and
16 threw him against a fence.

17
18 70. In 1986, BENT CORYDON was physically assaulted by
19 Scientologists while looking for his attorney in a Federal
20 courthouse, said shoving occurring in front of Defendant HEBER
21 JENTZCH and Scientology attorney JOHN PETERSON.

22
23 71. On or about February 1986, pursuant to said above-
24 described conspiracy, and pursuant to plans first discussed in
25 1984, a tall heavy-set Scientologist entered the Church of
26 Sciologos, and after discovering that BENT CORYDON was not
27 present, proceeded to physically strike and beat up MARC CHACON
28 claiming they were interfering with the Church of Scientology.

/ / /

1
2 71. Continually, and to the present, Defendants, and each
3 of them, through their conspiracy have attempted to dissuade
4 followers of the Church of Sciologos from continuing in said
5 service. And in 1987, they published the lie that Plaintiff BENT
6 CORYDON was guilty of "criminal" acts against the Church.

7
8 72. Pursuant to the conspiracy, threatening telephone calls
9 have been continuously made to Plaintiff and to other Defendants
10 in the COSMOR lawsuit, and each of them, and efforts in 1987 were
11 made to prevent publishing of BENT CORYDON's book, including
12 attempts to steal same.

13
14 73. On or about the beginning of April 1, 1987, Church of
15 Scientology members, identifying themselves as such, began to
16 call the non-listed private residence number of Sciologos
17 employee Bob Ross for purposes of harassment. And in at least
18 1987, Cross-Defendants have bugged Cross-Plaintiff's telephones.
19 Twice in 1987, Defendants have trespassed on BENT CORYDON's home
20 and moved objects from therein into the street, i.e., one plant
21 and one chair.

22
23 74. Said actions, by Cross-Defendants, and each of them,
24 have interfered with the ability of the Church of Sciologos to
25 carry on its businesses. It has been damaged the same in an
26 amount to be proven in court and both compensatory and punitive
27 damages are demanded.

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EXHIBIT C

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2 TENTH CAUSE OF ACTION

3 (Intentional Infliction of Emotion Distress
4 Against All Defendants)

5 75. Plaintiff realleges by this reference and incorporates
6 paragraphs 1 through 23, and paragraphs 57 through 74, and by
7 this reference makes them a part hereof.

8
9 76. Said conduct on the part of Defendants, and each of
10 them, is egregious and beyond the bounds of decency and was
11 designed to cause Plaintiff emotional distress. It was
12 reasonably foreseeable from the same that Plaintiff would suffer
13 emotional distress from those actions.

14
15 77. As a proximate result thereof, Plaintiff did in fact
16 suffer emotional distress, continue to suffer the same, and has
17 been damaged in an amount to be proven at the time of trial. As
18 such actions were intentional, malicious and willful punitive
19 damages are also demanded.

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27 / / /

28 / / /

 / / /

EXHIBIT C

1
2 WHEREFORE, Plaintiff prays for judgment against Defendants,
3 and each of them, as follows:
4

5 1. General damages in a sum according to proof at time of
6 trial in excess of the minimum jurisdictional amount of this
7 Court;
8

9 2. All statutory damages in a sum in excess of the minimum
10 jurisdictional amount of this Court;
11

12 3. All special damages according to proof at time of
13 trial;
14

15 4. For exemplary and punitive damages in an amount
16 according to proof at time of trial;
17

18 5. For costs of suit and attorney's fees incurred herein;
19

20 6. For such other and further relief as the Court may deem
21 just and proper.
22

23 DATED: September 12, 1988

SAYRE, MORENO, PURCELL & BOUCHER

24
25 By: 

FEDERICO C. SAYRE, Esq.
Attorneys for Plaintiff
Bent Corydon
26
27
28

PROOF OF SERVICE BY HAND

STATE OF CALIFORNIA)
COUNTY OF LOS ANGELES) ss

I, Evelyn Taylor, am a resident
of/employed in the aforesaid county, State of
California. I am over the age of 18 years and not a
party to the within action. My business/residence
address is: 10866 Wilshire Blvd., Fourth Floor, Los
Angeles, California 90024.

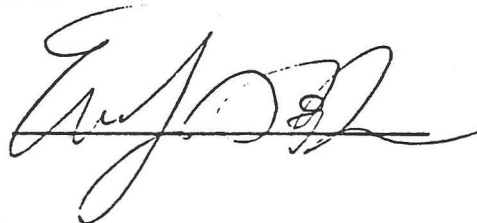
On October 28, 1988, I served the foregoing:
JOINDER IN MOTION TO UNSEAL FILE on the interested
parties in this action by placing a true copy
thereof, enclosed in a sealed envelope, addressed as
follows:

SEE ATTACHED SERVICE LIST

By personal service, I caused such envelope to
be delivered by hand to the offices of the
addressee.

I certify under the penalty of perjury under
the laws of the State of California that the
foregoing is true and correct.

Executed on October 28, 1988



ATTACHED SERVICE LIST

LENSKE, LENSKE & HELLER
6400 CANOGA AVENUE
SUITE 315
WOODLAND HILLS, CA 91367

LITT & STORMER
3550 WILSHIRE BLVD.
SUITE 1200
LOS ANGELES, CA 90010

PETERSON & BRYNAN
8530 WILSHIRE BLVD.
SUITE 407
LOS ANGELES, CA 90211

